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RICHARD W. WIEKING  
CLERK  
U.S. DISTRICT COURT  
NO. DIST. OF CA, S.J.

ORIGINAL  
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FEB 22 1996

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

In the United States District Court  
for the Northern District of California

ROGER SCHLAFLY, Plaintiff ) Case C-94-20512 SW PVT  
v. ) Schlafly Declaration 4  
PUBLIC KEY PARTNERS, and )  
RSA DATA SECURITY INC., Defendants. ) Feb. 29, 1996

Declaration on patent issues

I, Roger Schlafly, declare:

1. I am the Plaintiff in this case.

2. I have personal knowledge of each and every fact set forth below  
and can competently testify thereto.

3. I was a graduate student at the University of California at  
Berkeley in the late 1970s, and was familiar with academic  
practices.

4. I have knowledge and expertise in the area of cryptography.

5. I commonly asked professors for preprints or reprints of articles  
they had written. They were always happy to comply. Preprints were

1 passed around promptly and freely, and without confidentiality  
2 restrictions.

3  
4 6. The Diffie-Hellman invention is clever, and subtle, but also  
5 striking in its simplicity. A few sentences would suffice to enable  
6 a cryptographer in 1976 to practice the invention.

7  
8 7. The general knapsack problem was (and still is) thought to be  
9 computationally infeasible. However, the trapdoor knapsacks devised  
10 by Hellman-Merkle are special versions of the general knapsack, and  
11 have been shown to be feasible to break, and hence insecure.

12  
13 8. For a cryptosystem to be useful, it has to be secure the great  
14 majority of the time.

15  
16 9. A cryptosystem which can be cracked a significant percentage of  
17 the time is not useful.

18  
19 I declare under penalty of perjury under the laws of the United  
20 States that the foregoing is true and correct. Executed on Feb. 22,  
21 1996 in Soquel, California.

22  
23 Dated: Feb 22, 1996

24  
25 By: 

26  
27 Roger Schlafly  
28

CERTIFICATE OF SERVICE

=====

Schlafly v. Public Key Partners and RSA Data Security Inc.  
Case No. C-94-20512-SW, (PVT).  
Filed on July 27, 1994, San Jose, Calif.

The undersigned hereby certifies that he caused a copy of:

Brief Regarding Stanford Patent Validity  
Schlafly Declaration 4  
Notice of Pendency of Other Action

to be served this date by First Class Mail upon the  
persons at the place and address stated below which is  
the last known address:

Thomas R. Hogan  
60 S Market St Ste 1125  
San Jose, CA 95113

Thomas E. Moore  
Tomlinson et al  
200 Page Mill Rd  
Palo Alto, CA 94306

Jana G. Gold  
Morrison et al  
755 Page Mill Rd  
Palo Alto, CA 94304

Robert D. Fram  
Heller et al  
525 University Ave  
Palo Alto, CA 94301

and to be emailed to Patrick Flinn at pflinn@alston.com.

I declare under penalty of perjury under the laws of the State  
of California that the foregoing is true and correct.

Executed in Soquel, Calif. at the date below.

Dated: Feb 22, 1996

By: 

Plaintiff, Roger Schlafly, Pro Se